

201-14072



JuanB Perez/DC/USEPA/US

11/14/2005 11:11 AM

To NCIC HPV@EPA

cc

bcc

Subject Fw: ETAD North America Commitment to HPV Challenge

----- Forwarded by JuanB Perez/DC/USEPA/US on 11/14/2005 11:10 AM -----



Tucker Helmes

<HelmesT@socma.com>

11/10/2005 04:41 PM

To NCIC OPPT@EPA, Rtk Chem@EPA

cc Charles Auer/DC/USEPA/US@EPA, Jeffrey

Taylor/DC/USEPA/US@EPA

Subject ETAD North America Commitment to HPV Challenge

Please see attached letter updating the commitment for the **Stilbene Fluorescent Brighteners** category.

Dr. C. T. Helmes
Executive Director
ETAD North America
1850 M Street, NW #700
Washington, DC 20036
Tel 202-721-4154 / Fax 202-296-8120
helmesT@socma.com



hpvcommit.revision.2005.doc

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November 10, 2005

201-16072

RETURN RECEIPT REQUESTED, PLEASE, BY E-MAIL

Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

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ATTN: Chemical Right-to-Know Program
RE: HPV Registration No.

Dear Mr. Johnson:

ETAD North America (formerly the U.S. Dye Manufacturers Operating Committee of the Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers – USOC/ETAD) would like to provide an update of our above-referenced commitment to the High Production Volume (HPV) Challenge Program.

In 2001, a consortium of ETAD North America companies fulfilled its commitment to cosponsor the single HPV chemical, **C.I. Fluorescent Brightener 220 (CAS No. 16470-24-9)** under the International Council of Chemical Associations (ICCA) program with Bayer AG as lead company and Germany as sponsoring country.

The ETAD North America consortium in December 2002 revised its commitment under the U.S. EPA's HPV Challenge Program to sponsoring the category of **Stilbene Fluorescent Brighteners**. ETAD North America now revises its commitment further by separating out the **Stilbene Fluorescent Brighteners Intermediates** into a second category, as shown below:

Stilbene Fluorescent Brighteners

<u>CAS No.</u>	<u>NAME</u>
4404-43-7	C.I. Fluorescent Brightener 28
4193-55-9	C.I. Fluorescent Brightener 28, disodium salt
13863-31-5	C.I. Fluorescent Brightener
16090-02-1	C.I. Fluorescent Brightener 71, 244, 250, or 260
16470-24-9	C.I. Fluorescent Brightener 220
29637-52-3	C.I. Fluorescent Brightener 235
67786-25-8	C.I. Fluorescent Brightener 263

Stilbene Fluorescent Brighteners Intermediates

81-11-8	2,2'-Stilbenedisulfonic acid, 4,4'-diamino-
7336-20-1	2,2'-Stilbenedisulfonic acid, 4,4'-diamino-, disodium salt
3709-43-1	2,2'-Stilbenedisulfonic acid, 4,4'-dinitro-, disodium salt

By separating the original category into a category for the whiteners themselves and a second category for the intermediates, we are able to provide a stronger scientific rationale for grouping similar chemicals, applying read across analysis, and using surrogate test data to address all relevant SIDS endpoints. In addition, having two smaller, more compact categories will enhance clarity and transparency in the evaluation of the categories.

The participating companies in this ETAD North America consortium are Ciba Specialty Chemicals, Clariant, and Lanxess. The consortium will submit the test plans and robust summaries for these categories by the end of December 2005.

Please direct any questions, comments, or requests for additional information to me at 202-721-4154 or by e-mail at helmest@socma.com.

Sincerely,

C. Tucker Helmes, Ph.D.
Executive Director
ETAD North America